



# Indiana Department of Education

SUPPORTING STUDENT SUCCESS

March 16, 2011

Mr. Nicholas Eccles, Superintendent  
North White School Corporation  
121 W. State Road 16  
Monon, IN 47959

Dear Mr. Eccles:

On January 14, 2011, the Indiana Department of Education's (IDOE) English Learning & Migrant Education staff commenced an on-site monitoring review of North White School Corporation's administration of the Title III of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB), and the State of Indiana Non-English Speaking Program (NESP). Enclosed is a report based upon those reviews.

Prior to, during, and following the on-site monitoring review, the IDOE staff conducted a number of activities (described in the attached report) to verify compliance with the programmatic requirements of Title III and the State of Indiana Non-English Speaking Program.

The enclosed report summarizes the results of the on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, specific documentation as requested. IDOE will review the documentation and determine if it is sufficient to remove or remedy any identified compliance issues.

In all cases where there are findings of non-compliance, North White School Corporation **is responsible for taking appropriate action to remedy compliance issues**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, North White School Corporation must submit a detailed action plan with timelines and benchmarks for corrective action. IDOE is available to provide technical assistance as requested.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities and in assisting North White School Corporation with improving the delivery of Title III and NESP services.

Sincerely,

Mary Gardner, ELL Specialist  
Division of Student Learning  
Indiana Department of Education  
[mgardner@doe.in.gov](mailto:mgardner@doe.in.gov)

cc: Alyson Luther, Title III Director, Division of Student Learning, Indiana Department of Education  
Michelle Hay, Title III/NESP Program Administrator, North White School Corporation

**Indiana Department of Education  
Title III and Non-English Speaking Program Monitoring**

**District:** North White School Corporation

**Monitoring Staff:** Olga Tuchman & Mary Gardner, EL Specialists, Office of English Learning & Migrant Education, Division of Student Learning, IDOE.

The Indiana Department of Education (IDOE) commenced on-site monitoring of North White School Corporation on January 14, 2011. The purpose of the on-site monitoring visit was to identify areas of strength, areas in need of improvement, and areas of non-compliance with regards to the Title III and Non-English Speaking Program requirements.

IDOE specifically monitored in the following areas:

<b>Monitoring Topic</b>		<b>Statutory Citation</b>
1.1	Compliance with the English Language Proficiency Assessment requirements	NCLB, Title III §3113 NCLB, Title III §3116
1.2	Compliance with requirements specific to meeting the Annual Measurable Achievement Objectives (AMAOs)	NCLB, Title III §3122(a)(1-3) NCLB, Title III §3111(b)(2)(B)
1.4	Compliance with the English Language Proficiency (ELP) Standards requirements	NCLB, Title III §3113
1.5	Compliance with Data Collection and Reporting requirements	NCLB, Title III §3121; §3123 EDGAR 34; CFR 76.731
2.1	Compliance with requirements for English Language Acquisition and Language Enhancement Programs	NCLB, Title III §3111 (b)(2)
2.4	Compliance with Parental Notice and Outreach requirements	NCLB, Title III §3302 Title VI, 34 CFR § 100.3 (a)(b)
2.5	Compliance with Program Design and Implementation requirements	NCLB, Title III §3115

During the on-site visit, IDOE spent time interviewing the Title III/NESP Program Administrator of North White School Corporation and the Superintendent of North White School Corporation. In addition, IDOE visited Monon Elementary School and North White Jr/Sr High School where observations and interviews were conducted with EL staff, general classroom teachers and school principals. IDOE also reviewed documents from North White School Corporation including district ESL policies and procedures, district notices to parents and student record information. Based on the above information, the report follows.

## **Monitoring Topic 1.1: Compliance with NCLB, Title III Compliance with the English Language Proficiency Assessment Requirements**

*Statutory Requirements are contained in sections 3113 and 3116*

### **Background**

IDOE interviewed the Title III/ NESP Program Administrator regarding compliance with the English Language Proficiency Assessment requirements.

### **Areas of Compliance, Recommendations, & Required Actions**

#### **Home Language Survey Implementation (1.1.1):**

North White School Corporation's Home Language Survey is included in the Student Enrollment Packet. This is administered to all Kindergarten parents and to parents enrolling their students in North White School Corporation for the first time. This document is then kept in the student's cumulative folder for easy access. The Home Language Survey is given out in English or Spanish when necessary.

**Recommendation (1.1.1):** The IDOE suggests that the Home Language Survey be limited to three questions addressing the language spoken by the student, not the adult. An approved IDOE example can be found here: <http://www.doe.in.gov/lmmp/helpful.html>. The Home Language Survey is a very important document and it is critical that parents understand it clearly. This will help parents make sure they are answering the HLS accurately and will help North White School Corporation provide the appropriate services for their students.

**Suggested Action:** North White School Corporation should submit evidence that the questions on the Home Language Survey exclusively reflect student-specific information.

#### **English Language Proficiency Placement Assessment (1.1.2, 1.1.3, 1.1.4):**

At North White School Corporation, the ENL staff, Migrant staff, Title I staff and instructional assistants administer and score the LAS Links Placement Test. They are trained using sample materials and a WebEx from the IDOE website. This training is led by the Title III Program Administer, Michelle Hay. All Kindergarten students or students new to the state of Indiana who have indicated that English is not their primary language on their Home Language Survey take the LAS Links Placement Assessment.

**Recommendation (1.1.3):** The IDOE requires sign-in sheets to record attendance at LAS Links Placement Trainings. This allows the district and the state to verify who has received the required training to administer the LAS Links Proficiency Test.

**Suggested Action:** North White School Corporation must submit evidence that a process has been put in place for recording attendance and samples of the training materials used at LAS Links Placement Trainings.

**English Language Proficiency Annual Assessment (I.1.5):**

Each January, the Title III/NESP Director holds an ESL LAS Links Assessment Training for the ENL staff, Migrant staff, Title I staff, and instructional assistants who will be giving the annual assessment. This includes sample LAS Links materials and the IDOE's WebEx resources. All LEP students take the LAS Links Annually until they have received two consecutive scores of 5.

**Recommendation (I.1.5):** The IDOE requires sign-in sheets to record attendance at LAS Links Proficiency Trainings. This allows the district and the state to verify who has received the required training to administer the LAS Links Proficiency Test.

**Suggested Action:** North White School Corporation must submit evidence that a process has been put in place for recording attendance and samples of the training materials used at LAS Links Proficiency Trainings.

**Findings of Non-Compliance and Required Actions for Monitoring Topic I.1**

There are no findings for Monitoring Topic I.1.

<p style="text-align: center;"><b>Monitoring Topic I.2:</b> <b>Annual Measurable Achievement Objectives (AMAOs)</b></p>
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*Statutory Requirements are contained in Section 3122(a)(1-3) and Section 3111 (b)(2)(B)*

**Background**

IDOE interviewed the Title III/ NESP Program Administrator regarding the delivery of English language development services as they relate to meeting the AMAOs.

**Areas of Compliance, Recommendations, & Required Actions**

**English Language Development Services in ESL and Content Area Classes (I.2.1):**

Data is utilized in a variety of ways to ensure that limited English proficient students are meeting the Annual Measureable Achievement Objectives (AMAOs). In addition to the required LAS Links and ISTEP+/ECA administration each year, North White School Corporation student progress is monitored carefully through many of the following methods: STAR Early Literacy, STAR Reading, STAR Math, Accelerated Reader, Accelerated Math, Acuity, North White School Corporation quarterly assessments in Language Arts, Math, and Content areas and individual teacher assessments in content areas. Reading is the focus for North White School Corporation for the 2010-2011 school year, and Marzano's strategies are used to help support student reading growth. All of these assessments and strategies are used to help LEP students across the district to reach their AMAO goals.

**AMAO Determinations (I.2.2):**

North White School Corporation's central office receives the AMAOs and Michelle Hay, the Title III administrator, emails the results to the principals. Principals are encouraged to share this information with their staffs.

**Recommendation (1.2.2):**

North White School Corporation does not have a process to ensure that all general education program staff are informed about how AMAOs are calculated and the LEA's performance in each of the three areas. It is critical that all general education teachers are made aware of AMAOs, because it increases teacher investment and awareness of the success of their EL students.

**Suggested Action:** North White School Corporation must submit evidence that training regarding AMAOs has occurred for all general education teachers.

**Findings of Non-Compliance and Required Actions for Monitoring Topic 1.2**

There are no findings for Monitoring Topic 1.2.

<p style="text-align: center;"><b>Monitoring Topic 1.4:</b> <b>Compliance with the English Language Proficiency (ELP)</b> <b>Standards Requirements</b></p>
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*Statutory Requirements are contained in Section 3113*

**Background**

IDOE interviewed the Title III/NESP Program Administrator, principals, teachers and the corporation's ESL staff regarding usage of the English Language Proficiency Standards.

**Areas of Compliance, Recommendations, and Required Actions****Training and Technical Assistance (1.4.1):**

Concentrated professional initiatives have remained central to curricular mapping and the alignment of instruction and assessment over the past three years, with Steve Benjamin & Associates providing the foundational structure for NWSC work. ELA and Math standards have been mapped incorporating the ELP standards for grades K-6, so the elementary schools have a very strong understanding of them. The ELP standards have been woven in to help teachers incorporate them into their lessons. Teachers, by and across grade levels, and by departments have mapped ELA/Math Standards, with the inclusion of classified staff, so that all shareholders are involved in the process for discussion/identification of standards/skills to be mapped. North White School Corporation has very small grade levels, which allows for easy collaboration and time to work with the standards. All teachers receive the standards at the beginning of the year, and onsite professional development occurs throughout the year with the focus of linking them to the general education standards.

**Ongoing Use of the English Language Proficiency Standards (1.4.2):**

All instruction at North White School Corporation is standards-based. At the elementary level, teachers use their mapped ELA and Math standards with the ELP standards woven in to help with teacher expectations and grading. Each teacher is instructed to use these standards to best reach the needs of their students. Teachers also meet in their grade level teams to discuss the ELP standards implementation. At the secondary level, teachers receive a folder with each student's detailed LAS Links information, the ELP standards, and their content standards. At the first North White Jr/Sr High School's faculty meeting of the school year, the

integration of the ELP and content standards are discussed and priority skills are ranked. More in-depth work takes place between individual teachers and coaches as needed.

#### **Findings of Non-Compliance and Required Actions for Monitoring Topic 1.4**

There are no findings for Monitoring Topic 1.4.

### **Monitoring Topic 1.5: Compliance with Data Collection and Reporting Requirements**

*Statutory Requirements are contained in Section 3121 and 3123; EDGAR 34 and CFR 76.731.*

#### **Background**

IDOE interviewed the Title III/ NESP Program Administrator regarding the formal data reporting process specific to English Learners (EL).

#### **Areas of Compliance, Recommendations, and Required Actions**

##### **DOE-LM Reporting (1.5.1):**

At each building in North White School Corporation, the building administrative assistants input information into the student data system. Their information comes from program coordinators. Ms. Lear, the data collection steward, reviews correct procedures and translates any questions the administrative assistants might have. Once the data has been collected and put in a file format, Ms. Lear submits the file to the program coordinator, Michelle Hay, for final approval. After approved by the program coordinator, the data is submitted to the IDOE via the STN application center.

##### **DOE-LM Discrepancy Process (1.5.2):**

Any discrepancies of DOE-LM come to the data collection steward. The data collection steward then corrects the error based upon information from program staff or the program coordinator. Once the discrepancy has been fixed, the information is resubmitted to the IDOE.

#### **Findings of Non-Compliance and Required Actions for Monitoring Topic 1.5**

There are no findings for Monitoring Topic 1.5.

### **Monitoring Topic 2.1: Compliance with requirements for English Language Acquisition and Language Enhancement Programs: Programmatic Support**

*Statutory Requirements are contained in Section 311 (b)(2)*

#### **Background**

IDOE interviewed the Title III/NESP Program Administrator, ESL Staff and general education teachers regarding English language development programs.

### **Areas of Compliance, Recommendations, and Required Actions**

#### **Use of Professional Development Provided by the State (2.1.1):**

At the beginning of each school year all teachers and classified staff receive a “sample” packet to examine a simulated student enrollment process. These packets include many resources from the IDOE’s website including: criteria for selection/identification, LAS Links Placement score analysis, parent contact information, Individualized Learning Plan format and procedures, classroom accommodations and teacher responsibilities, and scientifically-based research for best practice instruction. Materials are shared separately with elementary and secondary teachers due to the differences in teacher need. Follow-up discussions and question and answer sessions are then held to make sure all teachers understand their responsibility in the learning process of their EL students.

#### **District Provided Professional Development (2.1.2):**

North White School Corporation provides several professional development opportunities to support EL student achievement. Mida Creekmur has been working with grades K-6 to integrate the link between the curriculum and the ELP and content standards. She is working with these grades on vocabulary enrichment and Marzano’s best practices. Mida meets with staff once a month to present new material and follow up on previous sessions. Study groups and collaboration times are also scheduled with Title III Director Shelle Hay.

Secondary (7-12)- Professional development is guided in North White School Corporation by the North White Continuous Improvement Team, which is a group of 2-3 representatives from each building in the district. This team is comprised of building-level teachers and administrators and focuses on developing grade level and departmental collaboration, study group work, reading strategies, and utilizing assessment data.

#### **Evaluation of Professional Development for Effectiveness (2.1.3):**

Principals work hard to ensure that professional development opportunities are successful and implemented into the classroom. Principals keep clipboards in every teacher’s classroom with observation sheets. Principals are in every teacher’s classroom twice a week to observe and evaluate teachers. Principals look to see if teachers are integrating their new knowledge from professional development opportunities to best meet the needs of their students.

After each professional development opportunity, teachers fill out a form evaluating the experience. Teachers fill out an open ended questions and a ranking portion. The Title III Director then compiles all of the responses to gain an understanding of how the teachers viewed the process.

#### **Collaboration (2.1.5):**

At the elementary level, collaboration is fluid and takes place on an almost daily basis. Teachers have their prep (during student specials) each day, which allows for frequent collaboration. This is also a time when teachers can reach out to the EL staff to gain more support or guidance. Teachers and EL staff also communicate frequently through email, and will keep each

other up to date on what takes place in the general education classroom. This allows the EL teacher to provide additional support during pull-out, and it helps the general education teacher know what modifications to make to support their students. The EL teacher and general education teacher also collaborate on the creation and updating of student ILPs. There is also school-wide collaboration during data meetings.

At the secondary level, the EL teacher, Magaly Bope, and her assistant have strived to create constant collaboration. Teachers have become more open to working with the EL staff due to the impressive outreach from the EL staff. EL staff members are constantly in the classroom with students and speaking with teachers on an almost daily basis. The EL staff keeps up with student progress and frequently discusses modifications or accommodations that need to be made to increase student achievement. Teachers give notes and outlines to the EL staff to let them know what material is next. This allows the EL staff to preemptively assist students with possible academic difficulties. Teachers also feel comfortable letting the EL teacher know what help they feel students need. This open and constant communication allows students to be fully immersed in their mainstream classes.

### **Findings of Non-Compliance and Required Actions for Monitoring Topic 2.1**

There are no findings for Monitoring Topic 2.1.

## **Monitoring Topic 2.4: Compliance with Parental Notice and Outreach Requirements**

*Statutory Requirements are outlined in Title III, Section 3302 and Title VI 34 C.F.R. § 100.3 (a)(b).*

### **Background**

IDOE interviewed the IDOE interviewed principals, teachers, ESL staff, and the Title III/ NESP Program Administrator regarding parental notification and outreach.

### **Areas of Compliance and Recommendations**

#### **Annual Parental Notification (2.4.1):**

EL staff members ensure the annual parent notification letter is sent no later than 30 days after the beginning of the school year (or within two weeks of late enrollment). There are copies of this letter in English and Spanish. EL staff members follow up with parents during parent-teacher conferences to ensure there are no questions or concerns.

#### **Recommendation (2.4.1):**

It is essential that North White School Corporation includes more explicit information in their annual parent notification including how the student was identified for EL services based upon the LAS Links Assessment.

**Suggested Action:** North White School Corporation must provide more explicit information in their annual parent notification letter including that the child qualified for the program based upon their LAS Links Assessment score.



**Future Action (2.4.1):**

Starting in the fall of the 2011-2012 school year, a mail receipt will be required for each annual notification letter.

**Parental Outreach (2.4.2):**

Important documents, including school newsletters, are translated and sent home to families. Translators are always used at school events or parent conferences. Parents feel very connected to the EL staff and frequently call or send notes to be translated. EL staff members go on home visits and call home to report on student successes or concerns. The EL staff has worked very hard to foster a strong relationship with the community, and each school has a community member on the EL staff. Schools hold "Coffee Hours," where parents can come in and speak with the principal. Title III and Title I staff have also held "Reading Nights," with food and childcare to encourage family involvement.

**Recommendation (2.4.2):**

North White School Corporation needs to create and distribute a Parent Survey of Needs. This will be an effective means of outreach to parents of LEP students, and will foster the relationship between these parents and the school. It will also provide schools with important information about their LEP students.

**Suggested Action:** North White School Corporation must provide Parent Needs Survey and a plan for how it will be implemented across the district.

**Findings of Non-Compliance and Required Actions for  
Monitoring Topic 2.4**

There are no findings for Monitoring Topic 2.4.

**Monitoring Topic 2.5:  
Compliance with Program Design and Implementation  
Requirements**

*Statutory Requirements are contained in Section 3115.*

**Background**

IDOE interviewed the Title III/ NESP Program Administrator, Principals, ESL staff and general education staff regarding program design and implementation requirements.

**Areas of Compliance and Recommendations**

**Classified Staff are Fluent in English (2.5.1):**

All classified staff members at North White School Corporation who work with ELs are fluent in English based upon their degrees.

**Certified Staff are Fluent in English (2.5.2)**

The human resources policy document ensures that all teachers at North White School Corporation are Highly Qualified.

**Supervision of Instructional Paraprofessionals (2.5.3):**

ENL teachers and classroom teachers create all lesson plans used by the Instructional Assistants. Intervention teachers and school principals periodically fill out an Intervention Fidelity Check document to ensure that instructional assistants are working under the direct supervision of a certified teacher in an effective, productive way.

**English Language Development Program Model (2.5.4):**

Detailed below are programs and services that happen at each school.

**Elementary Level: Monon Elementary**

Level 1 students come to the EL teacher daily for 30 minutes of pull-out instruction. Students work on their reading and vocabulary skills as well as the computer program Ellis. Students who are levels 2 and 3 come three days a week for 30 minutes and work on reading skills, vocabulary skills, language skills, and the Ellis program. At Monon Elementary School, the Title I teacher pulls out Level 1 and 2 students for 45 minutes each morning to work on letters, sounds, sight words, and leveled books. He also pulls out Level 3 and 4 students with other children who struggle with complex vocabulary and idioms. Push-in happens across grades for students who are EL levels 1-4. Each building has 5-6 assistants who offer support in social studies and science, helping the students to access the material. The assistants also work on reading skills and strategies with students. A verbal plan is discussed with the mainstream teacher to determine what instructional assistants will do each week.

**Secondary Level: North White Jr/Sr High School (Grades 7-12)**

Magaly Bope teaches the ENL class, which consists of six Level 1s and one Level 2. She uses High Point and English Without Barriers, along with the mapped ELP standards. These standards have been aligned with North White School Corporation's ELA and Math standards and allow Ms. Bope to organize her instruction clearly. Students meet in this class for 50 minutes five days a week. There is also a Math Lab and an English Lab, which are small remediation classes of approximately 10 students. This gives students the opportunity to have more support as they learn content and a new language. The secondary level also has an ESL resource room, where students receive additional language support. This room is managed by Ms. Tackett and is staffed on a daily basis by her and Ms. Wilcox. Students can take tests, do homework, read, or receive any help they may need throughout the day. Level 1 and 2 students have a period for this class built into their school day, but general education teachers also frequently send EL students down to receive accommodations or modifications. Teachers send students down with an ESL pass that specifically explains the supports, accommodations or modifications the student needs.

The EL staff works very hard to make sure that students receive the support they need, while pushing towards an inclusion model. The instructional assistant and EL teacher push-in throughout the school day. The EL staff has made a plan to create more inclusion of Levels 1, 2, and 3 into general education classes. The EL staff has had constant communication with the teachers to help support them as they move to have more EL students in their class. The EL staff also worked with parents to improve the program and create scaffolds for students in content classes. Students give oral presentations in small groups and use textbooks that have Spanish translations. EL staff also modified tests and held a tutoring program after school to give extra help to students who needed it. They also monitored student grades on a weekly basis to make sure they are being successful. The EL staff also worked with the school

counselor to make sure students who were Levels 1 or 2 were in classes with students who were Levels 3 and 4. North White School Corporation has seen improved student grades and increased student involvement since pushing this inclusion program with their high expectations.

The school also has “Vikes Days” which take place each day for 20-25 minutes. This is an opportunity for the school to focus on reading skills and vocabulary development. One day the teacher preteaches vocabulary, then teaches vocabulary for the next two days, then there is a reading day, and finally they are tested on their new vocabulary.

#### **Future Action (2.5.4):**

Any employees who are split-funded with Title III and another program must keep a quarterly maintenance of effort log. This includes employees who are responsible for the 7-12 resource room.

#### **Instruction and Assessment Adaptations (2.5.5):**

An ILP is created for all LEP students. The EL teacher creates the ILP with input from the student’s classroom teachers. It is an in-depth look at the modifications and accommodations the student needs. It is used for grading and for testing accommodations. Each teacher receives a copy of their student’s ILP and teachers are very familiar with this document. Parents also receive a copy at their child’s parent-teacher conference. The teacher, with a translator when necessary, explains the ILP to the parent. The ILP is updated annually and more often when necessary.

#### **Reclassification (2.5.6):**

At North White School Corporation, students are monitored for at least two years. At the elementary level, the ENL teacher, classroom teacher, counselor, and principal monitor students who have received one or two 5s on their LAS Links Annual test. They use classroom performance, RTI interventions, standardized test scores, and school/district assessments. At the secondary level, the EL staff, counselors and school principal are involved in monitoring student progress using the same types of data. Student data is monitored and analyzed on at least a quarterly basis. The Director of Title III, Shelle Hay, also checks in on monitored students twice a month during her Thursday morning meetings. Students who need extra assistance can be re-entered into the language development program.

#### **Scheduling (2.5.7):**

At the elementary school, students are placed into the classroom that will best meet their needs. The EL and Title I staffs make sure that pull out does not happen during either the core literacy block or the core math block. Instead, all pull out instruction takes place during center time. At the secondary level, the school’s goal is for all EL students to receive a Core 40 diploma. Students with a lower level score on the LAS Links Assessment are scheduled in pairs with a strong peer with whom they feel comfortable. EL students are also scheduled together in small groups to make push-in more successful and meaningful. EL students are scheduled for credit recovery classes when they need extra support. Students who arrive at the secondary level with a LAS Links score of Level 1 are initially placed in classes where they can be successful with their limited English proficiency such as ENL, ENL resource room, art, nutrition, etc.

**Retention (2.5.8):**

North White School Corporation strives to be extremely cautious when looking at retaining an EL student. NWSC makes sure that students are not retained due to a language development issue. Students at risk of retention are monitored closely by the classroom teacher and EL staff at their school site. EL students receive extra support through their EL pull-out, push-in support, and by being placed in Tiers 2 and 3 of the Response to Intervention model. Student progress is monitored closely during this process. If the student is unsuccessful, they will be referred to the Student Support Team (SST), and continued monitoring. RTI Tiers 2 and 3, and EL services will be utilized to help the student. Retention is the last resort, when all interventions and supports are unsuccessful. Three EL students currently enrolled at North White School Corporation have been retained.

**Special Education Referrals (2.5.9):**

Student progress for all students at NWSC is monitored frequently. Students at the elementary schools are given biweekly ELA and math assessments to check progress, while at the secondary level students are given ongoing assessments. These assessments quarterly assessments, Loop 1 and 2 assessments, and reteaching assessments. EL students are monitored additionally by the EL staff. These students are monitored through their pull-out/small group work and during push-in support time in the classroom. If academic concerns that are not language-related arise for an EL student, teachers and EL staff work together to reinforce specific areas of concern, make parent contact, implement modified accommodations and provide Tier 2 and Tier 3 reinforcement through RTI. If after all of these supports have been implemented and the student is still not making adequate progress, a referral will be made to the building-level Student Support Team (SST). This team consists of a group of teachers, specialists, and the building administrator. The SST reviews the student's history, data, remediation attempts, and all other supports the student has received. The formal RTI process then begins and timelines are set. Documentation is made and the process continues. If unsuccessful, then the student is formally referred for Special Education. If the student requires testing to be administered in their native language, a bilingual school psychologist will accommodate the needs of the student. Nine EL students currently enrolled at North White School Corporation receive special education services.

**Collaboration across Programs (2.5.10):**

Buffalo Elementary, Reynolds Elementary, and Monon Elementary receive Title I funding. This means that all students, including ELs, will receive extra support and assistance from this program. Schools work to braid their Title I and Title III programs to best support their students, with many EL students receiving support from both. At Monon Elementary School, the Title I teacher pulls out Level 1 and 2 students for 45 minutes each morning to work on letters, sounds, sight words, and leveled books. He also pulls out Level 3 and 4 students with other children who struggle with complex vocabulary and idioms. The two programs also hold reading nights together to increase family involvement. Special education and intervention programs also include EL students when appropriate.

**Findings of Non-Compliance and Required Actions for  
Monitoring Topic 2.5**

There are no findings for Monitoring Topic 2.5.

**FISCAL MONITORING** (see the attached Fiscal Monitoring Report):

**Monitoring findings**

- I. Crowe reviewed the audit report for July 1, 2007 –June 30, 2009. There was one finding related to Deficiency in Internal Control. “Activities should be selected and developed at various levels to reduce risks and/or other fraud of the financial statements. The corporation has not separated incompatible activities related to all areas of the financial statements. Failure to establish these controls could enable material misstatements or fraud to go undetected.” The school corporation submitted a corrective action plan stating “receipts will be written by someone other than the person depositing the money, vendor checks will be written by someone other than the person reconciling the bank statements.”

**Required Action:** By April 27, 2011 NWSC must show evidence that their corrective action plan has been implemented.